

Doug Wolshlager
23289 76th street
Southaven, Mi
Attornatus Privatus

FILED - KZ

July 1, 2022 2:28 PM

U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

ems Scanned by ENS/7/1

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

1:22-cv-602

Paul L. Maloney
United States District Judge

Doug Wolshlager)	
Plaintiff's,)	Natural Action No:
)	
vs.)	Magerstraight :
Arthur 192-1304 Clarke III)	
Emmly Jipp)	
McKayla Lamance et al)	Date :
Kidnappers,)	
)	
)	
)	VERIFIED COMPLAINT FOR
)	MONEY DAMAGES, CIVIL
)	RIGHTS VIOLATIONS, U.S.C.
And)	TITLE 42, § 1983, 1985, 1986, 1988,
COUNTY OF VAN BERRIEN a.k.a.,)	
d.b.)	FRAUD, but not limited to.
VAN BERRIEN COUNTY , Inc.)	
SOUTH HAVEN, MI)	
Kidnappers,)	TRIAL HEREIN ORDER
John Doe 1-20 As yet to be discovered))	

COMPLAINT

PAGE 2

INTRODUCTION AND OPENING STATEMENT

- 1.
2. This Natural Rights action is brought by, Doug Wolshlager , as The People in common law, In a court of record hereinafter, Plaintiff, for redress of grievances against VAN BERRIEN COUNTY SEVENTH DISTRICT are employees of the CITY OF SOUTH HAVEN , subsidiaries of THE STATE, OF MICHIGAN corporation.
3. Kidnappers acted noncompliant with set policies and procedures of well established laws.
4. Kidnappers employed by the County of Van Berrien , acting under color of STATE law, purported a Fraud upon the Court, a clear violation of Plaintiff's

due process rights.

5. Rights guaranteed to this Plaintiff's and all others, by both State and United States of America constitutions, including all Laws and Treaties.
6. Kidnappers acting as public officials, operating as STATE Officials, had sworn an oath to uphold these laws above all others.
7. Acting STATE Officials operated under color of STATE law outside their delegated authority, likewise operated in noncompliance with their own rules, statutes, codes, ordinances, policies and procedures as promulgated by congress, both STATE and FEDERAL.
8. Kidnappers are State Officials acting under color of State law, causing Plaintiff's damage. By issuing sham legal processes, for a profit and a gain for themselves and the enterprise/corporation STATE OF, and its agencies. Kidnappers acting in concert, who knowingly, willingly, and with malice and forethought, generated false and fraudulent documents and placed these false and fraudulent documents before a court, on the record, causing public officials to act.
9. Thereby caused irreparable damage, harm, and injury to Plaintiff herein, by His wrongful arrest, wrongful detention, emotional distress, permanent mental damage, defamation, embarrassment, impairment of reputation, theft of His property, trespass, trespass on the case, and usurping His liberty interests.
10. Kidnappers are STATE Officials acting under color of STATE law as agents, or employees, or private Contractors for the enterprise/corporation, STATE OF MICHIGAN and/or its agencies.
 - 10.1.1. Kidnappers are STATE Officials operating in concert with other STATE Officials under color of STATE Law, to commit Acts of Belligerency in time of National Emergency, against a civilian non-combatant, then making false and fraudulent documents and swearing to the truth of the same. The above mentioned Kidnappers, while acting under color of STATE law, outside their jurisdiction and scope of authority, and in concert with each other, willfully, wantonly and recklessly, without regard to whether or not they were properly subject to an exemption from, administrative rules, codes, statutes, policies or procedures and Constitutional directives, and therefore, contrary to law, within the meaning of The Administrative Procedures Act, 5 U.S.C. § 706 (2)(A)(B)(C) &(D). with malice and forethought, caused Plaintiff's the damage to usurp His liberty interest, deprivation of rights, deprivation of liberty, physical and mental injury, financial injury, and loss of property rights.
 - 10.2.
11. In so doing, violated clearly established law, as those laws apply to

Plaintiff's rights protected under the Bill of Rights, and pertinent to the 14th Amendment of the constitution of the United States, and the guaranteed rights set forth in the State constitution.

12. Be it known, each of the STATE Officials, public servants, agents, employees, contractors, herein, have sworn an "Oath of Office" regarding their duties to Americans,. Kidnappers while working in concert, displaying gross misrepresentations by deceptive trade practices, while unlawfully receiving income derived directly or indirectly, from a pattern of unlawful predicated activity.

13. Therefore, Kidnappers with each of their acts construed under the color of STATE law, equates to criminal conspiracy under Title 42 U.S.C. § 1985.

14.

14.1. JURISDICTION AND VENUE

15.

16.

17. Plaintiff brings this civil action pursuant to Title 42 U.S.C. § 1983, 1985, 1986, 1988, and invokes the jurisdiction of this court pursuant to Title 28 USC § 1332, Diversity of citizenship; amount in controversy; costs. The amount in controversy in this case is more than \$75,000.

18. Title 28 U.S.C. § 1331. Federal question and Title 28 U.S.C. § 1343 (A) (3) (4). Civil rights and Elective franchise, and

19. Pertinent to the 14th amendment and the Civil Rights Act of 1870, section 6, rights protected under the Bill of Rights, particularly under the 1st, 4th, 5th, 6th, 8th, articles of the Bill of Rights, and

20. Pertinent to the 14th amendment to the Constitution of the United States of America, and

21. Title 18 Chapter 13 § 241- Conspiracy against Rights,

22. Title 18, Chapter 13, §242- Deprivation of Rights under Color of Law,

23. Title 18 U.S.C. Chapter 4- Mispriison of Felony,

24. Title 42 U.S.C. § 2000 d-7, receiving federal funding,

25. Title 28 U.S.C. § 1652, Title 18 USC § 1001. Statements or entries generally,

26. Title 18 USC § 2331. Definitions,

27. Title 18 USC § 1956. Laundering of monetary instruments,

28. USC 31. § 3729 False claims, and

29. Bivens v. Six Unknown Fed. Narcotics Agents, 403 U.S. 388 (1971).

30.

31. III PARTIES

32.

33. Plaintiff's, Doug Wolshlager at all times relevant to this complaint,
#2200022A lives in South haven, Michigan 23289 76th St

34. Kidnappers: 1007 E Wells St, South Haven, MI

35. Arthur H. Clarke III

36. Emmly Jipp

37. And
COUNTY OF VAN BERRIEN a.k.a., d.b.

38. VAN BERRIEN COUNTY , Inc.

39. SOUTH HAVEN, MI

40. And

41. John Doe 1-20

42. As yet to be discovered OF VAN BERRIEN COUNTY 7th DISTRICT D.

43. Kidnappers at all times relevant to this complaint acting noncompliant,
willfully, and wantonly violated Plaintiffs due process.

44. All Kidnappers to be discovered. John doe 1-20

45. Kidnappers, at all times relevant to this complaint are employees, agents, or
private contractors of the agency VAN BERRIEN COUNTY, or are employees,
agents, or private contractors of the corporation STATE OF MICHIGAN,

46.

47.

48. IV STATEMENT OF FACTS

49.

50.

51. Factual allegations herein these complaints begin on March 2022

52. All allegations, injury, and damage alleged in this complaint are ongoing and
continue unless otherwise stated. Plaintiff edjacated the public servant about
The right to travel

53. Absent a 4th Amendment warrant, Kidnappers did find Plaintiff in a
private property in a stopped, arrest Plaintiff, for DRIVING WITH INVALID
LICENSE.

53.1. References please see verified.

54. #2200022A # K134666 South Haven 7th district
verifide

55. #2015044338 #2015044339 #2015044340 #16k121317 #2010001407-FH
#2016001621-ST #201915295 #2019015294 #2019015293
#20180163331-SM

56. #2019000118-ST #2021000840 #2021043944-ST #2021003954-ST

57.

58. Plaintiff was ordered out of his car, and immediately arrested without explanation or 4th Amendment warrant, then put in the back of the police car.

59. Kidnappers arrived within 10 minutes then transported Plaintiff in His police suburb directly.

60. Plaintiff was jailed without seeking a magistrate.

61. Plaintiff was processed and booked and given a “magistration”, a trial conducted in secret.

62. Kidnappers are well trained and educated professionals, who have sworn an oath of office, with superior knowledge of Law, customs, policies, rules and compliance procedures, known or should have known these well established laws.

63. That there is no complaint, or affidavit or court ordered warrant in evidence.

64. That there was no determination of probable cause in evidence.

65. There is no evidence of a true bill indictment.

66. . A person commits an offense if that person intentionally or knowingly harms another by unlawful acts to delay the service of another.

67. There is evidence that Plaintiff was falsely accused of committing a breach of the Michigan Penal Code, for which he can be charged for driving with an invalid license when absent a 4th Amendment warrant.

68. There is evidence of an administrative revenue scheme, involving law enforcement officers, the District Attorneys, and the Judicial Department working in concert, to create sham legal proceedings in order to generate counterfeit negotiable instruments.

68.1. Assigning CUSIP numbers and utilizing CRIS accounts and the bonding and securitization of the fraudulent documents by the enterprise/corporation, a violation of many STATE and FEDERAL securities’ laws.

69. Plaintiff was targeted, arrested, and threatened with trial.

70. A person commits the offense if he knowingly makes a false entry of a record, or presents any knowledge of its falsity with intent that is to be taken as genuine.
71. Kidnappers willfully, wantonly, displayed reckless disregard for well settled law by fraud, a gross violation of Plaintiff's rights.
72. Public servants have a fiduciary duty to the public and to the American people, likewise, a fiduciary duty not to breach the public trust.
73. Public servants have a fiduciary duty not to enter into any fraud, or enter any fraud into a Court proceeding.
74. Kidnappers VAN BERRIEN COUNTY Courthouse, when notified of Kidnappers and procedural faults, VAN BERRIEN COUNTY has chosen silence.
 - 74.1. VAN BERRIEN COUNTY CourtHouse, acting through their agents, engaged in a fraud scheme against the Plaintiff, acting outside of their lawful authority (ultra vires) and,
 75. when confronted with such unlawful actions, they refused to respond to Plaintiff and consequently created the equivalence of wrongdoing and fraud.
 76. *"Silence can only be equated with fraud where there is a legal or moral duty to speak, or*
 77. *where an inquiry left unanswered would be intentionally misleading. . . We cannot condone this shocking behavior by the Seventh District Our revenue system is based on the good*
 78. *faith of the taxpayer and the taxpayers should be able to expect the same from the government in its enforcement and collection activities." U.S. v. Tweel, 550 F.2d 297, 299. See also U.S. v. Prudden, 424 F.2d 1021, 1032; Carmin v. Bowen, 64 A. 932*
 79. *Fraud Deceit, deception, artifice, or trickery operating prejudicially on the rights of another, and so intended by inducing him to part with property or surrender some legal right.*
 80. *23 Am J2d Fraud § 2.*
 81. *Anything calculated to deceive another to his prejudice and accomplish the purpose, whether it be an act, a word, silence, the suppression of the truth, or other device contrary to the plain rules of common honesty. 23 Am J2d Fraud § 2.An*
 82. *affirmation of a fact rather than a promise or statement of intent to do something in the future. Miller v Sutliff, 241 I I I 521, 89 NE 651*
83. . The Kidnappers and their agents did not act as a reasonable person would

act if Confronted with allegations of fraud and equivalence of fraud; conspiracy, racketeering, violations of the HOBBS Act, etc.

84. A reasonable person would dispute or explain the actions alleged to be fraudulent and illegal, unlawful and unconstitutional. Silence by Kidnappers and each of them and their agents in the face of allegations of fraud is the equivalence of consent. Under the rules of presumption:

85. *Rule 301 of the Federal Rules of Evidence states; " a presumption imposes on the party against whom it is directed the burden of proof [see Section 556(d)] of going forward with evidence to rebut or meet the presumption."*

86.

87.

88. III. JUDICIAL NOTICE OF PLAINTIFF INTENT

89.

90. Plaintiff has no intent for this Complaint to be, or become an appeal To this Court.

91. Plaintiff intent for this action is for redress of grievances, And to made whole, from the damages and sufferings caused by Kidnappers Named herein, by acting in concert, and under color of STATE law. The reference to Court Hearings, and case citing, and dates, and places, is for reference, for the Court to better understand Plaintiff's position.

92.

93. DAMAGES

94.

95. These actions by the Kidnappers, acting on the conspiratorial, corrupt and fraudulent activities by the Kidnappers and each of them was the proximate cause of damage to Plaintiff.

96. Damages to Plaintiffs and his family were, generally speaking, but not necessarily limited to:

97. pain,

98. harm,

99. suffering, emotional

100. distress, anxiety, abuse of property rights, manners.

101. Health

102.

103.

- 104. illegal denial of liberty interests under "color of State law",
- 105. encumbrance on Plaintiff's freedom of movement, **and**
- 106. loss of consortium
- 107. creation of fraudulent criminal records.
- 108. false arrest
- 109. False imprisonment
- 110. Fraud in original case
- 111. DDenial of Due Process
- 112. 54th Amendment Just Compensation
- 113. 5th Amendment Compel Witness
- 114. IImpersonating Public Servants
- 115. AAbuse of Office
- 116. AAbuse of Official Capacity
- 117. EEngaging in Organized Criminal Activity
- 118.
- 119.
- 120.

120.1. IMMUNITY.

- 121.
- 122.

122.1. Plaintiff is entitled to the protections and benefits conferred by the United States Constitution.

122.2. Plaintiffs are entitled to be held to a less stringent standard than professional attorneys. See:

123. *Haines v Kerner*, 404 US 519-521 (1972): "... allegations such as those asserted by Plaintiff's, however inartfully pleaded, are sufficient to call for the opportunity to offer supporting evidence. We cannot say with assurance that under the allegations of the pro se complaint, which we hold to less stringent standards than formal pleadings drafted by lawyers... "

124. *Platsky v. CIA*, 953 F.2nd 25, "Court errs if court dismisses pro se litigant without instructions of how pleadings are deficient and how to repair pleadings."

125.

126. None of the Kidnappers have immunity from civil suit since all Kidnappers are either a natural person or corporation – none of which has any form of sovereign immunity.

127. *all but against all similarly situated Indeed protection is not protection unless it does so. Immunity granted to a class however limited having the effect to deprive another class however limited of a personal or property right, is just as clearly a denial of equal protection of the laws to the latter class as if the immunity were in favor qt.. or the deprivation of right permitted worked against, a larger class."*

128. *TRUAX v. CORRIGAN, 257 U.S. 312, 332 (1921).*

129. Racketeering: Is a law term that applies to an organized conspiracy to commit the crimes of extortion or coercion, or attempts to commit extortion or coercion.

130. Racketeering is the obtaining of money or property from another, without his consent, induced by the wrongful use of force or fear. The fear which constitutes the legally necessary element in extortion is induced by oral or written threats to do an unlawful injury to the property of the threatened person by means of explosives, fire, or otherwise; or to kill, kidnap, or injure him or her, or a relative of his or her family, etc.

131.

131.1. FIRST CAUSE OF ACTION.

132.

133.

134. Plaintiff has been deprived of the Constitutional protections afforded to him, to usurp His liberty interest, under the 4th Amendment to the U.S. Constitution, i.e., the right to be secure in their persons, houses, papers, and effects, by Kidnappers and each of them.

135. The Kidnappers and their agents did not have a delegation of authority or legal, lawful and Constitutional right to do such things. This was accomplished by means of fraud, fear, intimidation, conspiracy and violations of State and Federal laws and such activities were forced on third parties who had no idea such illegal, unlawful and unconstitutional activities were occurring.

136. Kidnappers knowingly allowed the continuing illegal seizure of Plaintiffs, person, effects and private property rights in violation of Plaintiff's unalienable Constitutional protections and rights under the 4th Amendment, being fully informed as to their requirements, restrictions, and obligations, under the US Constitution as expressed by US Supreme Court rulings.

137. Kidnappers had a duty to act and to speak when these violations were brought to their attention. See *US v Tweel*, 550 F.2d 297, 299. Also see *US v Prudden*, and *Carmin v Bowen*.
138. Kidnappers did not act as a reasonable person would act. A reasonable person would respond by denying allegations of fraud and extortion if the person thought he or the corporation were innocent.
139. A reasonable person would present the documentation to show his authority.
140. A reasonable person would have sought counsel from the attorneys or other responsible officials.
141. Kidnappers remained silent and such silence is equivalent to fraud under such duty. Plaintiffs constitutional rights and protections were clearly established during the time of correspondence and before any correspondences occurred.
142. *" The Kidnappers then bear the burden of establishing that his actions were reasonable, even though they might have violated the plaintiffs constitutional rights." Benigni v. City of Hemet, 879 F.2d 473, 480 (9th Cir. 1988).*

143.

144. SECOND CAUSE OF ACTION

145.

146. Plaintiff has been deprived of the Constitutional protections afforded to him, under the Bill of Rights, particularly 1st, 4th, 5th, 6th, 8th, articles of the Bill of Rights, and pertinent to the 14th, amendments of the constitution of the United States, and the guaranteed rights set forth in the State constitution. The Kidnappers and their agents did not have a delegation of authority or legal, lawful and Constitutional exemption.

147. A person commits an offense if, with the intent of fraud, fear, intimidation, conspiracy and violations under color of State and Federal laws and such activities were forced on third parties, who had no idea such illegal unlawful and unconstitutional activities were occurring.

147.1. Acting public servants, Kidnappers, have a duty not to harm the American people.

147.2. Acting public servants have a duty to care. Acting public servants, actions display conscious indifference to oaths, constitutions, job descriptions, rules, regulations, and law, in the enterprise/ corporation's administrative revenue

scheme to use the courts and law enforcement as an engine of plunder, instead of justice.

147.3. To issue forth counterfeit securities and use the mechanics of the court to launder these securities for unjust enrichment to be shared between the various agencies and the enterprise corporation.

148. *" The Kidnappers then bear the burden of establishing that his actions were reasonable, even though they might have violated the plaintiffs constitutional rights." Benigni v. City of Hemet, 879 F.2d 473, 480 (9th Cir. 1988).*

149.

150.

150.1. THIRD CAUSE OF ACTION

151.

151.1. Plaintiff has been deprived of the Constitutional protections afforded to Him, under the Bill of Rights. A public servant acting under color of the servant's office or employment commits an offense if the public servant intentionally, knowingly, or recklessly causes a violation of due process.

151.2. The Kidnappers and their agents did not have a delegation of authority or legal, lawful and Constitutional exemptions to do such things.

151.3. Kidnappers have an absolute fiduciary duty to all United States citizens and even those people who were set apart by 15 stat. section 249, known as American Nationals. The fiduciary duty of all Public Officials, whether State, Federal or corporate, is explained clearly in *63C Am.Jur.2d, Public Officers and Employees, §247*, and again explained in The Bankruptcy Act of 1933, and the Code of Professional Ethics and General Order 100.

151.4. *" The Kidnappers then bear the burden of establishing that his actions were reasonable, even though they might have violated the plaintiffs constitutional rights." Benigni v. City of Hemet, 879 F.2d 473, 480 (9th Cir. 1988).*

152.

153.

153.1. FOURTH CAUSE OF ACTION

154.

- 154.1. In 2016, Kidnappers, acting as Police Officers for the enterprise corporation, MICHIGAN STATE OF, and its satellite, VAN BERRIEN, THE COUNTY OF MICHIGAN allowed use of unlawful, coercive extortive tactics against the natural people of Michigan by public servants.
- 154.2. A public servant acting under color of the servant's office or employment commits an offense if the public servant knowingly or recklessly causes, acts intentionally or with intent, with respect to a result of his conduct, when it is his conscious objective or desire to cause the result of usurping Plaintiffs liberty interest.
- 154.3. Kidnappers, acting as local law enforcement/ private contractors, cunningly coerce the people to give up their rights, by their impersonation of a government Official, for a profit and again, for Himself and private enterprise/corporation MICHIGAN, STATE OF, and it's Agencies, against the peace and dignity of the people of Michigan, causing a damage to the people of Michigan.

155. *" The Kidnappers then bear the burden of establishing that his actions were reasonable, even though they might have violated the plaintiffs constitutional rights." Benigni v. City of Hemet, 879 F.2d 473, 480 (9th Cir. 1988).*

156.

156.1.1.1. FIFTH CAUSE OF ACTION

157.

- 157.1. It is the continuing policy and custom of the enterprise/corporation agencies for MICHIGAN, STATE OF, and Municipal Corporations, to commit the herein named torts against the natural persons of Michigan, for a profit and a gain for themselves, and the enterprise/corporation STATE OF, Michigan, in violation of their fiduciary duties to the public and the people of Michigan , and in non-compliance with their own copyrighted codes, statutes, and ordinances.

158. *" The Kidnappers then bear the burden of establishing that his actions were reasonable, even though they might have violated the plaintiffs constitutional rights." Benigni v. City of Hemet, 879 F.2d 473, 480 (9th Cir. 1988).*

159.

160.

161.

162.

162.1.1.1. SIXTH CAUSE OF ACTION

163.

164.

165. Kidnappers, herein described acts and omissions, engaged under the color of STATE law; working in concert, while noncompliant with STATE OF MICHIGAN codes, statutes, ordinances, or procedures.

165.1. Likewise Kidnappers acted noncompliant with their fiduciary duties to the public, the people, because of the wrongful gross misrepresentation, and deceptive trade practices.

165.2. Defendant, agents, agencies, and the Privateers of the agencies, as a policy and customs, neglected to train, supervise, control, correct abuse of authority, or curtail outrageous conduct, to discourage the unlawful abuse of authority.

165.3. Including failure to give Kidnappers proper instructions and education as applicable to the inalienable rights of Americans, rights which are guaranteed by the bill of rights, as those rights apply to Plaintiff.

166. *" The Kidnappers then bear the burden of establishing that his actions were reasonable, even though they might have violated the plaintiffs constitutional rights." Benigni v. City of Hemet, 879 F.2d 473, 480 (9th Cir. 1988).*

167. *"Thus the guaranty was intended to secure equality of protection not only*

167.1.

167.2.

167.2.1. DECLARATORY AND INJUNCTIVE RELIEF

168.

169.

170. **WHEREFORE:** The Plaintiff demands judgment against Kidnappers and the Municipal Corporation of VAN BERRIEN COUNTY, it's agents, agencies, and the privateers for the agencies, and their marital relations where it applies,

jointly and severally as Kidnappers agents, agencies, and the privateers for those agencies, violated the united states Constitution, First (1st), Fourth (4th), Fifth (5th), pertinent to the (14th) Amendment, and the constitution of Michigan.

170.1. Kidnappers agents, agencies, and the privateers for those agencies, are operating in non-compliance with their own copyrighted codes, statutes, ordinances, policies and procedures, violating well established law. The private enterprise/corporation Agency MICHIGAN, STATE OF, and its high managerial agents' Private and combined acts is the proximate cause of the damage alleged herein;

171. **WHEREFORE:** The Plaintiff demands to be made whole:

172. (a.) Declaratory judgment for Plaintiff against Kidnappers, and VAN BERRIEN COUNTY, their agents, agencies, and the privateers for those agencies, and their marital relations, jointly and severally, where it applies, for damages, pursuant to Trezevant v. City of Tampa, adjusted for inflation; \$4000per day, per hour, per minute.

173. (b.) Declaratory judgment for Plaintiff against Kidnappers. and VAN BERRIEN COUNTY, and their agents, agencies, and the privateers for those agencies, and their marital relations where it applies, or, Punitive Damages; To be determined By A Jury for no less than \$31,182,972.24.

174. (c.) Declaratory judgment for Plaintiffs against Kidnappers and VAN BERRIEN COUNTY Their agents, agencies, and the privateers for the agencies, herein for, violation of Counter/defendant's rights by Parties named herein, their agents, agencies, and the privateers for those agencies, operating under color of STATE law, and noncompliance with their own copyrighted codes, statutes, ordinances, outside their jurisdiction and scope of authority, causing Plaintiff suffering and damages alleged herein.

175. (d.) Declaratory judgment for Plaintiff against Kidnappers and VAN BERRIEN COUNTY, and their agents, agencies, and the privateers for those agencies, for, the multiple accounts of fraud perpetrated against Plaintiff by above named Parties, their agents, agencies, and the privateers for those agencies, causing Plaintiff the suffering and damages as alleged in this Claim.

176. (e.) Declaratory judgment For Plaintiff against Kidnappers and VAN BERRIEN COUNTY, their agent, agencies, and the privateers for its agencies, for, harm, rights violations, trespass, and trespass on the case as alleged against these named Parties. Their agents, agencies, and the privateers for those agencies, within the (4) four corners of this Claim, as those rights are guaranteed to Plaintiff by the 1st, 4th, 5th, Article of the Bill Of Rights, and the 14th amendment to the constitution of the united states of America.

177.

178. (f.) Declaratory judgment for all Kidnappers and VAN BERRIEN COUNTY, its agents, agencies, and the privateers for those agencies, to have separate counsel, in order to avoid any conflict of interest.

179.

180. (g.) Plaintiff reserves the right to amend this counterclaim as needed, correct or update list of Parties as Their identities become known.

181.

182. (h.) All fees in processing this action pursuant to Title 42 U.S.C. § 1988.

183.

184. (i.) Such other and further relief as the court deems proper.

185.

185.1.

185.2. PRAYER

185.2.1. Plaintiffs court will find from the preponderance of evidence, a clear violation of due process, likewise, plaintiff prays for relief, and made whole, in the amount \$31,182,972.24. Now, bearing in mind the foregoing instructions, if you find from the evidence beyond a reasonable doubt that on or about March, 2022 in VAN BERRIEN COUNTY the Kidnappers did violate due process laws you will find the Kidnappers guilty.

Dated: 7-01-2022



Doug Wolshlager

23289 76th St, South haven, MI

THE STATE OF MICHIGAN)

)

Jurat

)

VAN BERRIEN COUNTY)

Subscribed and sworn to (or affirmed) before me on this ____ day of
____(month), ____ (year), proved to me on the basis of satisfactory evidence
to be the person(s) who appeared before me and executed this instrument.

SEAL:

WITNESS

Signature _____

My commission expires: _____

Please serve Kidnappers.

Arthur H. Clarke III	1007 E Wells St, South Haven, MI 49090
Emmly Jipp	1007 E Wells St, South Haven, MI 49090
McKayla Lamance	58155 M-51, Dowagiac, MI 49047
Lisa John-Doe 1	1007 E Wells St, South Haven, MI 49090
Ronda John-Doe 2	1007 E Wells St, South Haven, MI 49090